

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

LETISSA WILLIS,)
)
)
Plaintiff,)
)
)
v.) CIVIL ACTION FILE NO.
)
)
WELLSTAR HEALTH SYSTEMS,)
)
)
Defendant.)

NOTICE OF REMOVAL

Defendant WELLSTAR HEALTH SYSTEM, INC.,¹ by and through its undersigned counsel and pursuant to 28 U.S.C. §§ 1441(a) and 1446, hereby files this Notice of Removal and shows this Court as follows:

1.

On December 16, 2022, Plaintiff filed a lawsuit in the Superior Court of Cobb County, Georgia captioned as *Letissa Willis v. Wellstar Health Systems*. This lawsuit was assigned Civil Action File No. 2022-0161346-CV. True and correct copies of the Complaint, as well as all other process, orders or pleadings received by the

¹ Wellstar Health System, Inc. is misidentified in Plaintiff's Complaint as "Wellstar Health Systems."

Defendant by service or otherwise in this action are attached hereto as **Exhibit “A”** as required by 28 U.S.C. §1446(a).²

2.

The United States District Court for the Northern District of Georgia, Atlanta Division, includes Cobb County. Accordingly, removal to this Court is proper under 28 U.S.C. § 1441(a).

3.

Plaintiff's Complaint alleges violations of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e, *et seq.* ("Title VII") in that she labels her Complaint as one for "sexual harassment/discrimination" and refers to the Charge of Discrimination she filed with the United States Equal Employment Opportunity Commission alleging violations of Title VII.

4.

As a result, the United States District Court for the Northern District of Georgia, Atlanta Division, has jurisdiction over this matter pursuant to 28 U.S.C. § 1331, 28 U.S.C. § 1441(b) and (c) and other applicable laws, as this case is a civil action arising under the Constitution and/or laws of the United States.

² Several of these documents are of poor quality. Defendant has provided the best copy available, as they were in this condition when served on Defendant.

5.

On December 27, 2022, Plaintiff served Defendant. As such, Defendant has timely filed its Notice of Removal within the 30-day time limit imposed by 28 U.S.C. § 1446(b).

6.

Promptly after filing this Notice of Removal, written notice of this filing will be provided to Plaintiff and a copy of this Notice of Removal will be filed with the Superior Court of Cobb County, State of Georgia. A copy of the Notice to Plaintiff of Removal of Superior Court Action is attached hereto as **Exhibit “B”**. Exhibit B was served on all adverse parties.

7.

By filing this Notice of Removal, Defendant does not waive any defense that may be available to it.

Respectfully submitted this 19th day of January, 2023.

**GREGORY, DOYLE, CALHOUN
& ROGERS, LLC**
Attorneys for Defendant

/s/Charles L. Bachman, Jr.
Charles L. Bachman, Jr.
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CERTIFICATE OF COMPLIANCE WITH L.R. 5.1B

I certify that the foregoing pleading was prepared in Times New Roman, 14-point font, as approved by Local Rule 5.1B.

/s/Charles L. Bachman, Jr.
Charles L. Bachman, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on January 19, 2023 I filed the foregoing **NOTICE OF REMOVAL** by electronic filing using CM/ECF and served true and correct copies upon all parties in this matter by U.S. Mail with proper postage affixed to ensure delivery and addressed as follows:

Letissa Willis
5617 Norman Court
Atlanta, Georgia 30349

/s/Charles L. Bachman, Jr.
Charles L. Bachman, Jr.